



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

BDM:KKO  
F. #2017R01840

*271 Cadman Plaza East  
Brooklyn, New York 11201*

December 20, 2019

By ECF

The Honorable Nicholas G. Garaufis  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.  
Criminal Docket No. 18-204 (S-2) (NGG)

Dear Judge Garaufis:

Enclosed please find a stipulation executed by the United States and Sara Bronfman in the above-referenced criminal case (the "Stipulation"). Pursuant to the terms of the Amended Preliminary Orders of Forfeiture entered as to Nancy Salzman, Lauren Salzman and Allison Mack on or about July 17, 2019, the United States was instructed to send direct notice to all persons known to have an interest in any of the assets listed therein. The United States sent notice to Sara Bronfman, *inter alia*, that the government was seeking to forfeit these assets, including the real properties located at 447, 455 and 457 New Karner Road, Albany, New York (the "New Karner Road Properties"). The enclosed Stipulation, resolves Sara Bronfman's claim to the New Karner Road Properties. The government respectfully requests that the Court "so-order" the enclosed Stipulation.

Thank you for Your Honor's consideration of this submission.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/  
Karin Orenstein  
Assistant U.S. Attorney  
(718) 254-6188

cc: Counsel of Record (by ECF)